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SECTION I: GENERAL INFORMATION

1. PURPOSE AND SCOPE

This Regulatory Specification (“Specification”) establishes some of the baseline environmental compliance requirements for all Materials, Parts, components and/or Products whether finished or semi-finished (“Deliverables”) where this Specification is referenced in a statement of work, drawing, part or Product Specifications, sourcing agreements, purchase contracts, purchase orders or other procurement documents.

In reading the requirements in this Specification, it is important to note the following terms: a) should, may, expect – Action is strongly recommended; b) Must, will, shall – Action is required.

2. RESPONSIBILITY

As a global merchant, Master Lock Company LLC and its affiliated businesses (“Master Lock” or “Company”) are required to comply with many regulatory requirements and directives as it relates to Product and manufacturing standards around the world. This Specification contains the baseline environmental compliance requirements for Deliverables.

Master Lock Engineering, Product and Procurement teams must ensure they understand these requirements when designing Products, placing Products on the market or sourcing Materials, Parts, raw Materials, components and/or Products whether finished or semi-finished. Other requirements may exist and Master Lock associates are required to understand any additional requirements before sourcing Materials or procuring Finished Goods.

New and existing external Suppliers, including raw material, component, Original Equipment Manufacturers (OEM), as well as Finished Good contract manufacturers to Master Lock are also required to ensure Deliverables comply with the requirements provided in this Specification as it contains restrictions on Materials, certain chemicals used in manufacturing and other requirements.

The requirements in this Specification are provided as a supplement to, not as a replacement for or altering of, the terms or conditions with pre-established agreements, engineering drawings or Specifications.

If conflicting interpretations of the requirements in this Specification arise, the following order of precedence applies unless otherwise noted contractually: a) Agreements (quality, supply, etc); b) Specification Requirements; c) Purchase Orders; d) Supplier Quality Manual. It is important to note that in addition to this Specification, Master Lock maintains environmental and/or related requirements as references in any statement of work, drawing, part or Product Specifications, sourcing agreements, purchase contracts, purchase orders or other procurement documents.

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3. DEFINITIONS

- 3.1. Article – an object which during Production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition. This definition is from EU Regulation 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).
- 3.2. CAS No. – Refers to the chemical abstract number assigned to a chemical for unique identification. The CAS numbering system is an international convention and has no inherent chemical significance, but provides a way to identify a chemical substance or molecular structure when there are many possible systematic, genetic, proprietary or trivial names.
- 3.3. Children’s Product – a consumer Product designed or intended primarily for children 12 years of age or younger.
- 3.4. Children’s Toy – a consumer Product designed or intended for a child 12 years of age or younger for use by the child when the child plays.
- 3.5. Deliverable(s) - any tangible item(s) delivered by or for a Supplier to Master Lock in accordance with a purchase contract or other agreement with Master Lock. Deliverables include, but are not limited to, Materials, Parts, components, and/or Products whether finished or semi-finished.
- 3.6. Environmental Laws – include laws, rules and regulations at local, state, provincial, national or international level that relate to environmental matters, including without limitation, material restrictions, material bans, labeling, availability of Product, environmental information, battery requirements and other similar requirements, regardless of where they are sold to Master Lock.
- 3.7. Finished Product / Finished Good – a Product that does not need any further manufacturing. A Finished Product would be one that is ready to be placed in commerce and for the consumer to use.
- 3.8. Homogeneous – having uniform composition throughout. Examples of Homogeneous Materials are individual types of plastics, ceramics, glass, metals, alloys, resins, and coatings. Mechanically disjointed means that the Materials can, in principle, be separated by mechanical actions such as unscrewing, cutting, crushing, grinding, and abrasive processes.
- 3.9. Intentionally Added or Intentional Addition – a Substance is deliberately utilized in the Production of a Material or Part.
- 3.10. Laws – (a) U.S. federal, state and local laws, regulations and ordinances, (b) laws, regulations and ordinances of other countries and local governments from, through, or to which Regulated Products or their component raw Materials are manufactured, distributed or transported, (c) additional laws that Master Lock identifies in writing, and (d) any amendments to any of the foregoing laws, rules or regulations.

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- 3.11. Materials - chemical Substances and Preparations that are supplied for the Production of Parts, Products and other items (e.g., plastics, metals, coatings, paints, lubricants, additives and adhesives) and chemical Substances or Preparations that are shipped with Parts or Products (e.g., cleaners, lubricants and oils).
- 3.12. Not Detected - Below the detection limit of established test standards or appropriate industry wide test methods. In general, these test standards/methods should achieve trace level detection or at the lowest detection capabilities of the specific sample matrix.
- 3.13. Packaging – material used to protect products from damage due to storage or transportation (e.g., boxes, shipping supplies, cushioning & foam, bags, shrink wrap, tapes, adhesives). This includes and inks and dyes used to label packages.
- 3.14. Parts – fabricated materials, components, devices and assemblies.
- 3.15. Post-consumer recycled content – at least a portion of the material content comes from post-consumer materials where post-consumer materials are materials generated by consumer business or institutional sources that have served their intended use or completed their lifecycle and would be destined for disposal had they not been diverted from the waste stream for reuse or recycling.
- 3.16. Preparation – a mixture or solution composed of two or more Substances, for example paint, lubricant or ink. This definition is found in the EU Council Directive relating to restrictions on the marketing and use of certain dangerous Substances and Preparations and EU Regulation 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).
- 3.17. Products - stand alone, final assemblies including complete Deliverable(s) supplied by an original equipment manufacturer (OEM).
- 3.18. REACH SVHC candidate list substances are substances identified as Substances of Very High Concern according to the process defined in Article 59 of EU REACH Regulation (EC) No. 1907/2006. The most recent list of REACH SVHCs can be found at: http://echa.europa.eu/chem_data/authorisation_process/candidate_list_table_en.asp. Please note that the SVHC candidate list is expected to be updated every 6 months (most likely in December and June of each year) so suppliers are advised to monitor this list accordingly.
- 3.19. RoHS substances are those substances regulated by European Union Directive 2011/65/EU, “on the Restriction of the Use of Certain Hazardous Substances (RoHS) in Electrical and Electronic Equipment.” These substances include mercury, lead, cadmium, hexavalent chromium, polybrominated biphenyls (PBBs) and polybrominated diphenyl ethers (PBDEs).
- 3.20. RoHS amended substances are those substance added by Commission Delegated Directive (EU) 2015/863 of March 2015 amending Annex II to Directive 2011/65/EU of the European Parliament and of the Council as regards the list of restricted substances. - DEHP - BBP - DBP – DIBP.

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3.21. Regulated Product – any article or component part thereof that is produced, distributed, or intended (i) for the personal use, consumption or enjoyment of a consumer, or (ii) Products regulated by the Consumer Product Safety Commission (CPSC), Environmental Protection Agency (EPA), Federal Trade Commission (FTC), Federal Communications Commission (FCC), Food and Drug Administration. Regulated Products shall include any Finished Products that are provided to Master Lock for further supply or distribution by or on behalf of Master Lock, in addition to any items intended for use by or on behalf of Master Lock.

3.22. Specifications – This Baseline Environmental Compliance Requirement Specification and any Specification referenced herein in addition to requirements developed by Master Lock and acknowledged by Supplier, including but not limited to work instructions and print files or other Product descriptions.

3.23. Substance – a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the Substance or changing its composition. This definition is found in the EU Council Directive relating to restrictions on the marketing and use of certain dangerous Substances and Preparations and EU Regulation 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). Substance includes such examples as ethanol and metals. Note: metals are included here not in the form of a part or Product such as a heat sink or sheet metal cover but as a metal such as aluminum or aluminum alloy. Substance goes beyond a pure chemical compound defined by a single molecular structure. The definition of the Substance includes different constituents such as impurities. Also note the word “Substance” is used throughout this Specification, only the “Substance” with a capital letter refers to this specific definition.

3.24. Threshold Level – concentration level or limit (equal to or) above which the presence of a Substance or material in a Product or subpart must be declared. Threshold levels are provided in ppm (and mass %). The general conversion used is 1000 ppm = 0.1% by weight.

Definitions not otherwise defined herein shall have the meanings set forth in the Definitions section of any statement of work, part or Production Specifications, sourcing agreements, purchase contracts, purchase orders or other procurement documents.

4. APPLICATION

This Specification applies to all Deliverables supplied to Master Lock that reference this Specification in a statement of work, print, contract or other Master Lock procurement document(s) whether dictated by Master Lock, the supplier or sub-tier supplier.

In the event of conflict between this Specification and any Master Lock part drawing requirement, Supplier shall immediately notify their Master Lock procurement representative.

Any deviation from the requirements of this Specification must have prior written approval by Master Lock’s procurement representative.

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In addition, Master Lock Procurement must also contact the Master Lock Global Compliance team for details on requirements for deviations from this Specification.

SECTION II – REQUIREMENTS

Master Lock’s Minimum Compliance Requirements are outlined below and are required for Deliverables to Master Lock, and applies to all Materials, Parts, components, and/or Products whether finished or semi-finished regardless of market of distribution or Product application. ***OTHER REQUIREMENTS MAY EXIST AND MASTER LOCK ASSOCIATES ARE REQUIRED TO UNDERSTAND ANY ADDITIONAL REQUIREMENTS BEFORE SOURCING MATERIALS OR PROCURING FINISHED GOODS.***

Suppliers to Master Lock shall be knowledgeable and are solely responsible for continuing to monitor legislative and regulatory developments related to any Deliverable supplied or offered for supply to Master Lock.

1) **PROPOSITION 65, SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986** *See also RS-000013*

Master Lock seeks to limit or prohibits the use of carcinogens, mutagens, and reproductive toxins. Labeling is required in a manufactured or supplied Finished Product that contains any Prop 65 Listed Chemicals, including packaging. Supplier to disclose to Master Lock any of the Proposition 65 Listed Chemicals, CAS Number and concentration present in the Deliverable. Disclosure required regardless of market of distribution.

2) **SUBSTANCES OF VERY HIGH CONCERN (SVHC) OR REGISTRATION, EVALUATION, AUTHORISATION AND RESTRICTION OF CHEMICALS (REACH)**
See also RS-000016

All manufacturing Materials supplied to Master Lock, regardless of location, are required to be in compliance with the restriction of Substances under the REACH Annex XVII as revised and Article 33, Substances added to the Candidate List by the European Union under REACH as a Substance of Very High Concern (SVHC) in concentrations greater than 0.1% by weight. Supplier to disclose to Master Lock any of the REACH Listed Chemicals, CAS Number and concentration present in the Deliverable, including packaging. Disclosure of Requirements apply regardless of market of distribution.

3) **LEAD IN PAINT, INK AND SURFACE COATINGS** *See also RS-000021*

Regardless of type of Product, lead in paint and surface coatings MUST NOT exceed 90 ppm.

4) **PHTHALATES**

In order to meet Laws in multiple jurisdictions (CPSIA 2008 and California Proposition 65), Master Lock prohibits the use of the following phthalates in concentrations of greater than 0.1% or 1000 ppm:

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Bis (2-ethylhexyl) phthalate (DEHP), CAS [117-81-7]; Bisphenol A (BPA), CAS [80-05-7]; Butyl benzyl phthalate (BBP), CAS [85-68-7]; Dibutylphthalate (DBP), CAS[84-74-2]; Diisononyl Phthalate (DiNP), CAS [28553-12-0, 68515-48-0]; Diisodecyl Phthalate (DIDP), CAS [68515-49-1, 26761-40-0]; Di-n-octyl Phthalate (DnOP), CAS [117-84-0]; and Dinonylhexyl Phthalate (DnHP), CAS [84-75-3].

5) **ELECTRONIC AND ELECTRICAL COMPONENTS** *See also RS-000022*

- a) Registration of Certain Electronic Devices (CED), Local, State, or International Laws. Supplier shall ensure all of the following for Certain Electronic Devices as defined by any local or State Authority or Agency: (i) the Regulated Product includes a manufacturer’s label properly affixed, (ii) the manufacturer has registered with the appropriate agencies for all States and (iii) all required notifications are provided for available recycling or reclamation offered by the manufacturer, such that the Product can be distributed to all States.
- b) Product Safety, Electromagnetic Compatibility (EMC), Energy Efficiency and Power Supplies. Regulated Products must conform to all applicable Product Safety (PS), Electromagnetic Compatibility (EMC), Energy Efficiency, and External Power Supply standards appropriate for their intended markets. These include testing, labeling and registration requirements applicable to the equipment type and intended markets (e.g., UL, CSA, IEC standards, ASTM, EU Directives, FCC, C-tick, IEC). To ensure applicable PS and EMC standards are met, Supplier must disclose to Master Lock if wireless or laser technology or other ionizing/non-ionizing emitter technology is used. Upon request, certificates, test reports and supporting documentation must be provided for all countries’ regulatory programs in which the Supplier has approval to market.

6) **BATTERIES AND PRODUCTS CONTAINING BATTERIES** *See also RS-000022*

The following requirements apply to all batteries supplied to Master Lock, in addition to Products containing and/or packaged with batteries and shall meet the material content restrictions listed in **TABLE .1**

- a) Appropriate Labeling and Packaging: All batteries and Products containing batteries shall be designed for easy identification and removal. Battery type, weight and location must be disclosed to Master Lock. Batteries shall be labeled with appropriate labels including, but not limited to, hazard warnings, battery type/chemistry and the manufacturer/brand name. The battery marking shall be located on or adjacent to each battery. Documentation that demonstrates compliance to regulations, such as Safety Data Sheets (SDS) or Product Data Sheets (PDS), must be supplied upon request.
- b) Battery Type Requirements. Batteries must be of a type that meet all applicable design, manufacture, marking, testing, and other battery specific requirements necessary to avoid classification as a dangerous good for purposes of transport for all modes of transportation, as defined in the following standards when shipped installed in, or with equipment: • United States, "Hazardous Materials Regulations," Title 49, Code of Federal Regulations, US Department of Transportation (DOT) (Including Special Provision 188) • International Civil Aviation Organization (ICAO), "Technical Instructions for the Safe Transport of Dangerous Goods by Air"

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• International Air Transport Association (IATA), "Dangerous Goods Regulations" • International Carriage of Dangerous Goods by Road (ADR) • International Maritime Dangerous Goods Code (IMDG) Each lithium battery must also be of a type that has been demonstrated to meet the lithium metal or lithium ion battery testing requirements in the most recent version of the UN Manual of Tests and Criteria, Part III, Subsection 38.3 (including any revisions, amendments, addenda, or other changes to those testing requirements that are effective as of the date on which the lithium battery is supplied to Master Lock). Documentation that demonstrates compliance with Laws, such as a Safety Data Sheet (SDS) or Product Data Sheet (PDS), test data, or UN Safety Test Certificates must be supplied upon request.

- c) Removable Coin/Button Cell. Consumer Products that contain a removable coin/button cell battery shall have a restriction that will prevent young children from accessing the battery. This restriction shall exceed the protection provided by a simple latch or hook on the battery cover, but still allow for easy removal by an appropriate individual.
- d) Mercury in Batteries. Mercury must not be Intentionally Added in any battery and a battery must not contain more than 0.0001% (1 ppm) mercury by weight.
- e) Cadmium in Batteries. The total cadmium content of batteries must not exceed 0.001% (10 ppm) by weight and must not exceed 0.0005% (5 ppm) by weight for built-in batteries (such as those that are soldered or glued).
- f) Lead in Batteries. Non-rechargeable type batteries must not contain lead exceeding 0.2% (2000 ppm) by weight. Built-in batteries (such as those that are soldered or glued) must not contain lead exceeding 0.1% (1000 ppm) by weight.
- g) Lithium Batteries. All lithium batteries supplied to Master Lock must be in packaging that meets the battery-specific requirements of both the IATA Part 1 Packing Instructions 965, 966, 967, 968, 969, and 970 and DOT, ADR, and IMDG Special Provision 188.
- h) Non-rechargeable Alkaline and Carbon-Zinc Batteries. Non-rechargeable alkaline and carbon-zinc batteries must be hermetically-sealed.
- i) Rechargeable Batteries. All rechargeable batteries or Regulated Products containing them are required to have Product user documentation on appropriate recycling or take back programs from the manufacturer or private labeler in accordance with all State laws such that the Product can be distributed to all States.
- j) Lead-Acid Batteries. Rechargeable sealed lead-acid batteries must meet dangerous goods transport criteria for non-spill-able batteries as specified in ICAO/IATA Packaging Instruction 806 and Special Provision A67, including testing at 13°C (55°F) to ensure no free liquid flows from the case when it is cracked or ruptured and the requirement that the batteries contain no free or unabsorbed liquid. In addition to the labeling requirements in Article IV, Section 5 of this document, the words "NONSPILLABLE" or "NONSPILLABLE BATTERY" must be marked on the battery and the outside packaging.

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7) **PACKAGING AND PACKAGING MATERIALS SUPPLIED AS PRODUCTS (NOT INTENDED FOR FOOD CONTACT)** *See also RS-000015*

- a) Toxics in Packaging: All Regulated Products supplied to Master Lock considered to be packaging or intended to be distributed for use as packaging Materials must comply with the most stringent Law applicable to heavy metals, including, but not limited to, Toxics in Packaging Laws enacted in selected States and the European Union Directive on Packaging and Packaging Waste (94/62/EC). Specifically, no Materials shall contain more than 100 Parts per million (ppm) of Lead, Cadmium, Mercury and Hexavalent Chromium in the aggregate, that is, all four of the metals combined (if lead alone, no more than 90 ppm). There may be no deliberate additions of these toxic heavy metals in the manufacturing processes of any Materials sold by the Supplier to Master Lock. Please see the following link for more information: www.toxicsinpackaging.org
- b) Chemicals (EU REACH Regulation EC No. 1907/2006). All Regulated Products supplied to Master Lock considered to be packaging or intended to be distributed for use as packaging must comply with the requirements under the European Union Directive for the requirements of Substances of Very High Concern in the Registration, Evaluation, Authorisation and Restriction of Chemicals (“REACH”) and can be found in the latest version of Master Lock’s RS-000016.
- c) California’s Safe Drinking Water and Toxic Enforcement Act of 1986 (commonly known as California’s Proposition 65). All Regulated Products supplied to Master Lock considered to be packaging or intended to be distributed for use as packaging must comply with the requirements under California’s Safe Drinking Water and Toxic Enforcement Act of 1986 (commonly known as California’s Proposition 65 “Prop 65”). Information about these requirements as it relates to Prop 65 can be found in the latest version of Master Lock’s RS-000013.
- d) Ozone-depleting substances. No packaging or packaging component used for Master Lock parts or products shall contain ozone depleting chemicals (ODC), including halogenated chlorofluorocarbons (CFCs) and hydrogenated chlorofluorocarbons (HCFCs).
- e) Plastic Bags: All plastic bags supplied to Master Lock intended for distribution as packaging for Consumer Products that may end up in or around homes, have a thickness of less than 1.0 mil. and an opening with a diameter of greater than 5 inches are required to have a suffocation warning for children such as or similar to the following: “WARNING: Keep this bag away from babies and children. Do not use in cribs, beds, carriages, or playpens. The thin film may cling to nose and mouth and prevent breathing.” Warning statement shall be of appropriate print size and legibility to meet all Laws.
- f) Rigid Plastic Containers (RPPC): All RPPC must be marked with the appropriate SPI resin identification code and contain at least 25% post-consumer recycled content to meet various State requirements. Exemptions to these requirements must be approved by Senior Management.
- g) Containers (bucket labeling): California Health and Safety Code §§ 108625-108640. All containers that would require labels warning of drowning dangers in any State in the United States must be labeled such that the Product can be distributed to all States.
- h) Formaldehyde Emissions from Composite Wood Products: All composite wood Products or composite wood Products contained in Finished Goods supplied to Master Lock are required to

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meet formaldehyde emissions limits of the California Air Resource Board (CARB) airborne toxic control measures (ATCM) and the US Formaldehyde Standards for Composite Wood Products Act of 2010. Suppliers are required to notify the appropriate Master Lock representative at the time of order if any Materials contain composite wood Products as that term is used by CARB or US EPA. The Supplier shall provide written certification, labeling, and compliance statements on invoices that the composite wood Products or composite wood Products contained in Finished Goods comply with the applicable emission standard specified in § 93120.2(a) of title 17, California Code of Regulations. Supplier shall maintain documentation of third party certification and testing to support compliance and make it available to Master Lock upon request.

8) CHILDREN'S PRODUCTS

- a) Consumer Product Safety Improvement Act (CPSIA) of 2008: All Regulated Products supplied to Master Lock must comply with the CPSIA of 2008, as amended. This applies, but is not limited, to Regulated Products intended for children 12 years old and younger. Some of the highlights of the rules following below:

CPSIA Section/Regulation	Requirement
Section 101: Children's Products Containing Lead; Lead Paint Rule	Substrate Materials must not contain more than 100 ppm of lead in accessible components. The paint and similar surface-coating Materials for consumer use must not contain more than 90 ppm.
Section 102: Mandatory Third Party Testing for Certain Children's Products	All Regulated Products intended by the manufacturer and/or specified by Master Lock as intended for children 12 years old and younger must comply with all applicable Laws and these Specifications including third party testing requirements.
Section 103: Labels for Children's Products	Supplier must provide compliant packaging and labeling for all Regulated Products, including tracking labeling of Children's Products in accordance with Section 103.

- b) Maine and Washington State Chemicals of High Concern: The Maine Toxic Chemicals in Children's Product law and the Washington Children's Safe Product Act. Supplier shall not sell or deliver to Master Lock any chemicals of high concern as defined by the respective Laws that require Manufacturers or Distributors to provide Notification to any Agency. More information can be found at the following websites:
- Maine Toxic Chemicals in Children's Products: <http://www.maine.gov/dep/oc/safechem/highconcern/>
 - Washington Children's Safe Product Act: <http://www.ecy.wa.gov/programs/swfa/cspa/chcc.html>
- c) Hazardous Liquid Chemicals: All liquids in Children's Products must not contain mercury, methanol, methylene chloride, petroleum distillate, toluene, xylene, ethylene glycol, diethylene glycol, or benzene under 16 CFR 1500.231(a).

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- d) All Children's Toys, Child Care Articles, and Children's Jewelry Supplier must meet all requirements as stated above for Children's Products. In addition, all Children's Toys, Child Care Articles, Children's Jewelry, and components thereof, must meet the following requirements:

CPSIA Section/Regulation	Requirement
Section 101: Children's Products Containing Lead; Lead Paint Rule	Substrate Materials must not contain more than 100 ppm of lead in accessible components. The paint and similar surface-coating Materials for consumer use must not contain more than 90 ppm.
Section 102: Mandatory Third Party Testing for Certain Children's Products	All Regulated Products intended by the manufacturer and/or specified by Master Lock as intended for children 12 years old and younger must comply with all applicable Laws and this Specification including third party testing requirements.
Section 103: Tracking Labels for Children's Products	Supplier must provide compliant packaging and labeling for all Regulated Products, including tracking labeling of Children's Products in accordance with Section 103.
Section 105: Labeling Requirements for Advertising Toys and Games	Supplier must notify Master Lock in writing of all Regulated Products which are required to contain a label, or cautionary statement, regarding choking hazards in accordance with Section 105.
Section 106: Mandatory Toy Safety Standards	All ASTM F963 (as amended) requirements must be met for Children's Toys including (but not limited to) requirements for art Materials and heavy metals (surface coatings and substrates).
Section 108: Products Containing Certain Phthalates	In order to meet Laws in multiple jurisdictions, Master Lock prohibits the use of the following phthalates in concentrations of greater than 0.1% or 1000 ppm in all Toy or Child Care Articles: Bis (2-ethylhexyl) phthalate (DEHP), CAS [117-81-7] ; Butyl benzyl phthalate (BBP), CAS [85-68-7] ; Dibutylphthalate (DBP), CAS[84-74-2] ; Diisononyl Phthalate (DiNP), CAS [28553-12-0, 68515-48-0]; Diisodecyl Phthalate (DIDP), CAS [68515-49-1, 26761-40-0]; Di-n-octyl Phthalate (DnOP), CAS [117-84-0]; and Dinonylhexyl Phthalate (DnHP), CAS [84-75-3].

- e) IL Lead Poisoning Prevention Act, 410 ILCS 45/1. 410 ILCS 45/1. Master Lock requires all Regulated Products considered Children's Toys or Children's Jewelry with any component part that contains lead in concentrations more than 40 ppm and less than 100 ppm to bear the appropriate warning statement described in this law.
- f) Bisphenol-a (BPA), Laws in multiple jurisdictions. Master Lock requires all Regulated Products intended for children under the age of three to be free of BPA.
- g) Plush or Stuffed Toys, Laws in multiple jurisdictions including Ohio, Pennsylvania, and Massachusetts. Supplier shall ensure all Plush or Stuffed Toys comply with testing, registration,

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labeling, and fees required for distribution such that the Product can be distributed to all States. Supplier shall provide documentation to support compliance when requested by Master Lock.

- h) Children's Jewelry: Suppliers are required to meet all requirements as stated above for Children's Products. In addition, all Children's Jewelry, and components thereof must meet the following: CPSIA § 101, local, State and other Laws. In addition to all third party testing to meet CPSIA requirements, Supplier must provide third party testing and certification to demonstrate compliance with Laws governing jewelry intended for children 12 years old or younger as defined by any authority or agency. Such Products must meet the most stringent of any Law, including those governing heavy metals including lead and cadmium. All children's jewelry Products shall comply with all requirements set forth in ASTM F-2923.
- i) Formaldehyde Emissions from Composite Wood Products: All composite wood Products or composite wood Products contained in Finished Goods supplied to Master Lock are required to meet formaldehyde emissions limits of the California Air Resource Board (CARB) airborne toxic control measures (ATCM) and the US Formaldehyde Standards for Composite Wood Products Act of 2010. Suppliers are required to notify the appropriate Master Lock representative at the time of order if any Materials contain composite wood Products as that term is used by CARB or US EPA. The Supplier shall provide written certification, labeling, and compliance statements on invoices that the composite wood Products or composite wood Products contained in Finished Goods comply with the applicable emission standard specified in §93120.2(a) of title 17, California Code of Regulations. Supplier shall maintain documentation of third party certification and testing to support compliance and make it available to Master Lock upon request.

9) CONFLICT MINERALS

Upon Master Lock's request, Supplier must disclose any Materials that it provides to Master Lock that contain (i) columbite, tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (ii) any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of Congo and adjoining countries (the "Covered Countries"); and provide a certification in a form approved by Master Lock as to whether such Materials (i) originate in the Covered Countries, (ii) are processed in conflict-free smelters or refineries; or (iii) come from recycled sources.

10) RESTRICTED SUBSTANCES

Master Lock limits, restricts or prohibits the use of certain Substances in its Deliverables based upon various world-wide regulations and directives as well as the Company's own internal policies.

The Substances listed in the **TABLE 2** shall be limited, restricted or prohibited from use within any Finished Good, material or part provided to Master Lock or manufactured by Master Lock or for use in a Product, including accessories and packaging based upon governmental, industrial, consumer

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safety and consumer regulatory requirements. The scope of restrictions varies by substance category and is not all-inclusive.

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TABLE 2 – Restricted Substances

Substance	CAS No.	Limit	Reference
2-(2-methoxyethoxy)ethanol (DEGME)	111-77-3	<0.1% by weight	Prohibited in paints, paint strippers, cleaning agents, and self-shining emulsions in concentrations equal to or greater than 0.1% by weight.
Arsenic and compounds	Various	Use Prohibited	Prohibited in wood Products and paints. Applications other than for wood or paint are reportable on the Supplier Material Declaration
Asbestos and Radioactive Substances	1332-21-4	Use Prohibited	Master Lock prohibits the presence of asbestos or asbestos-containing Materials and radioactive Substances or radioactive-containing Materials in Products supplied to Master Lock. These Substances shall not be present in any material or Deliverable
Azo colorants	94276-30-6	Use Prohibited	Colorants restricted when used in consumer goods which often come in contact with the skin whether textile or leather goods. Azodyes which may release one or more aromatic amines are prohibited above 30 ppm in textile and leather articles which may come into direct and prolonged contact with human skin. Azodyes are prohibited in concentrations above 0.1% by weight in colorants for textile and leather articles e.g., fabrics for headphones and wrist straps.
Benzo[a]pyrene	50-32-8	Use Prohibited	Prohibited in wood based Materials in excess of 0.5 milligrams per kilogram of dry matter.
Biocidal Product as defined in EU Regulation 528/2012 concerning the making available on the market and use of biocidal Products	Various	Use Prohibited	Prohibited on or in Deliverables, for example, prohibited for use as a treatment on Deliverables where the biocidal Product is expected to remain on the Master Lock Deliverable. This restriction shall not apply to treated articles where the sole treatment undertaken was the fumigation or disinfection of premises or containers used for storage or transport and where no residues are expected to remain from such treatment on the Master Lock Deliverable.
Butylbenzyl phthalate (BBP)	85-68-7	<0.1%	

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Substance	CAS No.	Limit	Reference
Cadmium (Cd) and its compounds	7440-43-9	<0.01%	RoHS restricted Substance. No exemptions. Any content in other Deliverables must be declared. For restrictions in battery applications see RS-000XX
Chromium trioxide	1333-82-0	<0.1%	
Chromium VI (Cr6+) and its compounds	18540-29-9	<0.01 %	
Decabromo diphenyl ether	1163-19-5	Use Prohibited	
Decabromobiphenyl Ether (DecaBDE)	1163-19-5	<0.1%	RoHS restricted Substance. No Exemptions. Any content in other Products must be declared.
Di-2-ethylhexyl phthalate (DEHP)	117-81-7	<0.1%	
Dibutyl (DBP)	84-74-2	<0.1%	
Diisobutyl (DIBP)	84-69-5	<0.1%	
Di-iso-decyl (DIDP)	26761-40-0 68515-49-1	<0.1%	
Di-iso-nonyl (DINP)	28553-12-0 68515-48-0	<0.1%	
Dimethylfumarate (DMF)	624-49-7	<0.1 ppm	DMF is a biocide that is often used in silica gel packs or drying agents to prevent Products from growing mold during storage and/or transport. Any Regulated Product accompanied with silica gel packs or drying agents during storage and/or transport must not contain DMF. DMF has a high chance of leaching into textiles and leather Products from the silica gel or drying agent pack. The presence of DMF in concentrations greater than 0.1 ppm is banned in consumer Products in the EU by the Commission Decision 2009/251/EC: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32009D0251:EN:NOT
Di-n-hexyl (DnHP)	84-75-3	<0.1%	
Di-n-octyl (DNOP)	117-84-0	<0.1%	
Formaldehyde	50-00-0	Use Restricted	Materials capable of releasing formaldehyde into the air, under reasonably foreseeable conditions of use at concentrations reaching or exceeding 0.1ppm are prohibited. The use of formaldehyde in textiles intended for skin contact is

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Substance	CAS No.	Limit	Reference
			prohibited (e.g. Wrist straps and headphones) above 120 mg/kg formaldehyde. The use of formaldehyde in wood applications may not be used if the formaldehyde emission caused by the wooden Materials exceeds 0.1 ml/m3 (ppm) in the air of a test chamber. Formaldehyde emission standards in Composite Wood must not exceed the following limits (see Section 2.12 for more details): Hardwood Plywood Veneer Core - 0.05ppm Hardwood Plywood Composite Core - 0.05ppm Particleboard - 0.09ppm Medium Density Fiberboard - 0.11 ppm Thin Medium Density Fiberboard - 0.13 ppm
Lead / lead compounds	7439-92-1	<100 ppm	General lead in substrate for Deliverable(s).
Lead / lead compounds	7439-92-1	<90 ppm	Paint and Surface Coatings.
Lead chromate	7758-97-6	<0.1%	Prohibited at or above 0.1% weight by weight of the Deliverable.
Lead chromate molybdate sulphate red	12656- 85-8	<0.1%	Color Index Pigment Red 104 Prohibited at or above 0.1% weight by weight of the Deliverable.
Lead sulfochromate yellow	1344-37-2	<0.1%	Color Index Pigment Yellow 34 Prohibited at or above 0.1% weight by weight of the Deliverable.
Mercury and its compounds	7439-97-6	<0.01%	RoHS 2 restricted Substance. No Exemptions. Any content in other Deliverables must be declared.
Nickel	7440-02-0	Use Prohibited	Use prohibited on Product surfaces when there is direct and prolonged skin contact. Prolonged contact with the skin is defined as contact with the skin of nick of potentially more than: <ul style="list-style-type: none">• 10 minutes on three or more occasions within two weeks; or• 30 minutes on one or more occasions within two weeks.

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Substance	CAS No.	Limit	Reference
Ozone-Depleting Substances (CFCs, HCFCs, HBFCs, carbon tetrachloride, etc.)	Various	Use Prohibited	As identified by the Montreal Protocol on Substances That Deplete the Ozone Layer. http://ozone.unep.org No Product received or manufactured by Master Lock may contain or be manufactured with a regulated ODS. As defined by the United States Environmental Protection Agency, a Product contains an ODS if the ODS is physically held within its structure. A Product is manufactured with an ODS if the Product comes into physical contact with an ODS during its manufacture. A current list of Ozone Depleting Substances is found in Appendices A and B, 40 CFR Part 82 Subpart A. ODS: http://www.epa.gov/ozone/science/ods Prohibited for Deliverables to contain or be manufactured with these Substances.
Pentachlorophenol and its salts and esters	87-86-5	Use Prohibited	Prohibited in the treatment of wood. Prohibited in wood based Materials in excess of 3 milligrams per kilogram of dry matter
Persistent Organic Pollutants (POPs)	Various	Use Prohibited	As identified by the Stockholm Convention on Persistent Organic Pollutants and Regulation (EU) 519/2012. All Materials supplied to Master Lock may not contain or be manufactured with a material listed as a POP. List can be found at: http://chm.pops.int/Convention/The%20POPs/tabid/673/language/en-GB/Default.aspx POPs: http://chm.pops.int/ Regulation (EU) 519/2012: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:159:0001:0004:en:PDF
Polybrominated biphenyls (PBB)	67774-32-7	<0.1%	RoHS restricted Substance. No Exemptions. Any content in other Deliverables must be declared.
Polybrominated diphenyl ethers (PBDE)	Various	<0.1%	RoHS restricted Substance. No Exemptions. Any content in other Deliverables must be declared.
Polychlorinated Biphenyls (PCB)	1336-36-3	Use Prohibited	Chemical prohibited under toxic substances control Act (TSCA) 40 CFR 761 and shall not be used.

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Substance	CAS No.	Limit	Reference
Polycyclic Aromatic Hydrocarbons (PAH)	83-32-9 208-96-8 120-12-7 56-55-3 50-32-8 205-99-2 192-97-2 191-24-2 205-82-3 207-08-9 218-01-9 53-70-3 206-44-0 86-73-7 193-39-5 91-20-3 81-5-8 129-00-0	<0.001%	Sum of 18 PAHs must not exceed 10 mg/kg
Polyvinyl Chloride (PVC)	9002-86-2	Use Restricted	While PVC is inert, its use in disposable packaging is a concern to many clients (e.g., Walmart) and therefore Master Lock has elected not to use PVC for packaging applications, unless an exception is granted in writing from a senior member of Master Lock's management.
Potassium chromate	7789-00-6	<0.1%	Prohibited at or above 0.1% weight by weight of the Deliverable
Potassium dichromate	7789-12-0 10588-01-9	<0.1%	Prohibited at or above 0.1% weight by weight of the Deliverable
PVC additives	Various	Use Restricted	Use and limits restricted under Prop 65
Red Phosphorous (Red-P) flame retardants	Various	Use Prohibited	Use prohibited as used in: Printed circuit boards, printed circuit assemblies, electrical and electronic components, packaging Materials such as encapsulates, die attach Materials, under fill epoxies and substrates

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Substance	CAS No.	Limit	Reference
Selenium (Se) and its compounds	7782-49-2	Use Prohibited	These Substances shall not be present in any polishes, paints, coatings, inks, adhesives or sealants.
Sensitizing Substances	Various	Use Prohibited or Restricted Depending on Use	Master Lock prohibits the use of strong sensitizers in manufacturing Materials as identified by the U. S. Federal Hazardous Substance Act (FHSA), and also restricts other known skin sensitizing Substances identified by Annex VI of European Union's Classification, Labeling, and Packaging (CLP) if present in Materials supplied at concentrations known to cause allergic reaction and become an accessible part of a Finished Product. A list of FHSA Strong Sensitizers can be found under 16 CFR § 1500. FHSA Guidance Document: http://www.cpsc.gov/Global/Regulations-Laws-and-Standards/Regulated-Products-Rules/strongsensitizerguidance.pdf Search engine for Annex VI: http://echa.europa.eu/addressing-chemicals-of-concern/harmonised-classification-and-labelling/annex-vi-to-clp
Tris (2,3 dibromopropyl) phosphate	126-72-7	Use Prohibited	Prohibited from use in textile articles intended to come into contact with skin, e.g. Wrist straps and headphones.
Alkylphenol ethoxylates (APEO)	Various	<0.1%	Use restricted in textile articles intended to come into contact with skin, e.g. wrist straps and headphones.
Nonylphenol ethoxylates (NPEO)	Various	<0.1%	Prohibited from use in Children's Products.
Octylphenol ethoxylates (OPEO)	Various	<0.1%	
Toulene	108-88-3	Prohibited	Prohibited as a Substance or constituent of Preparations in concentrations equal to or greater than 0.1% by mass in adhesives or spray paints.

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SECTION III - SUPPLIER REQUIREMENTS

All Materials, Parts and Products incorporated into Master Lock’s Products or bundled with Master Lock Products as part of a delivered solution are required to meet the requirements of applicable Specifications, Laws and regulations.

At Master Lock’s request, the Supplier must be able to provide technical documentation in the form of internal design controls, supplier declarations, or analytical test data.

Suppliers are also responsible for ensuring that Deliverables or services meet established compliance with this Specification in their own operations, in their subcontracted operations and in the Materials they procure for the manufacture of Deliverables for Master Lock as described herein.

Audits, approvals or verification by Master Lock of the Supplier’s facility, quality system, process controls, acceptance activities, etc., does not absolve the Supplier of the responsibility to provide acceptable Product, nor will it preclude the subsequent rejection of unacceptable Product. This Specification contains requirements for all Supplier types: raw and manufacturing material, component, OEM and Contract Manufacturers of Finished Goods, and Service Suppliers.

In addition to this Specification, Supplier shall ensure Deliverables comply with all Environmental Laws and are ready for import, export, sale or other distribution of the Deliverable in all jurisdictions worldwide, regardless of where they are sold to Master Lock.

1) PRODUCTS, MATERIALS AND WORKMANSHIP

The Master Lock Procurement Team will ensure that Supplier and sub-tier suppliers:

- a) Obtain their own copies of published mandatory government standards for the markets of distribution and are expected to maintain up-to-date information on Product regulatory requirements.
- b) Ensure manufacture of Products and Materials, Parts and assemblies for Master Lock in accordance with the most stringent Laws in any US State or locality as well as global laws and communicated Specifications.
- c) Design and manufacture all Products and Materials, Parts, and assemblies for Master Lock in conformance with the Substance restrictions listed under applicable regulatory requirements.
- d) Suppliers shall implement sufficient manufacturing, procurement, and verification procedures and controls to ensure that all Materials, Parts, and Products provided to Master Lock meet the applicable Substance restrictions.
- e) Implement sufficient controls to ensure that conforming Materials, Parts, and Products are used in the manufacturing process and that contamination is avoided.
- f) Changes to Deliverables must be communicated in writing a minimum of 90 days prior to any conversion and only if changes are required by and consistent with Laws.

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- g) Immediately notify Master Lock if it considers or has reason to believe that a material, part, or Product provided to Master Lock may contain a restricted Substance above the Threshold Level. The supplier shall immediately notify Master Lock at sourcingdepartment@mlock.com.

2) NOTIFICATIONS AND APPROVALS

Supplier must immediately notify Master Lock in writing of any of the following: (i) changes or likely changes in regulatory compliance status of Regulated Products or Materials regardless of cause; (ii) changes in composition of Regulated Products or Materials; (iii) any new information obtained about a Regulated Product or Material that renders prior statements incorrect; (iv) changes in manufacturer, processes or composition that may affect testing, certification, documentation or statements concerning the product. Change notifications are to be made in writing to the attention of your appropriate Master Lock purchasing representative.

All notifications must be made in sufficient time for Master Lock to comply with all Laws.

3) TESTING AND CERTIFICATIONS

- a) Supplier shall test all Deliverable(s) as required by Specifications and Laws and shall maintain documentation and records relevant to such testing for a period of at least ten (10) years from the end of production and make available the documentation to Master Lock upon request. Any required testing must be conducted prior to the first delivery of the Deliverable(s) to Master Lock. Periodic testing, whether or not required pursuant to a reasonable testing program shall be scheduled at intervals no greater than that allowed by Laws, and whenever a design, material or manufacturing change occurs which could affect the Deliverable's compliance with an applicable standard, or one year after the last test, whichever occurs first, unless otherwise agreed in writing by Supplier and Master Lock.
- b) Supplier must provide a General Conformity Certificate (GCC) or Children's Product Certificate (CPC) for all Deliverables, nonexempt component parts, or combinations thereof, subject to the rules and standards enforced by the U.S. Consumer Product Safety Commission (CPSC). CPCs must be provided for Children's Products or Materials that may be used to manufacture Children's Products, and based on testing by a third party laboratory accredited by the CPSC. A list of accredited laboratories and product testing requirements for third party testing can be found at <http://www.cpsc.gov/cgi-bin/labsearch/>. GCCs must be based on a reasonable testing program. Supplier must request contact information for this submittal from a Master Lock purchasing representative. All GCCs, CPCs and certificates of compliance provided must be in accordance with rules promulgated by CPSC and must be provided with each shipment or made available electronically prior to shipment of a Deliverable. The certificate must specify each rule, ban, standard, or regulation to which the Deliverable is being certified.
- c) If Supplier marks Deliverables as compliant with governmental or private certification programs, such Deliverables or Materials must meet all requirements for those certifications. Upon request of Master Lock, Supplier must promptly provide documents demonstrating compliance with all requirements for those certifications.

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- d) Supplier must investigate results from any testing that indicates a deviation from the Specifications or Laws. Each party will promptly notify the other of any result confirmed to be a deviation from the Specifications or Laws. Supplier will promptly develop, implement, and communicate to Master Lock all corrective actions necessary to address the deviation.

4) SUPPLIER DECLARATIONS

Master Lock’s Procurement or Quality Teams must secure Supplier Material Declarations for all Deliverables sold to Master Lock—notwithstanding if testing was completed.

The Supplier Material Declaration form must be completed and forwarded to Master Lock upon request. This includes documentation and data maintained by the supplier from their respective supply chain and supplier’s own records on the material content of the Product.

Suppliers are required to keep documentation and/or test data that demonstrates procedures and actions taken by the Supplier and the results to verify compliance of the Deliverable for ten (10) years from the end of Production and make available the documentation to Master Lock upon request.

5) VERIFICATION

For each Deliverable, the Master Lock Procurement or Quality teams will ensure that Suppliers:

- a) Provide Master Lock with a completed Declaration of Compliance declaring that the Products and Materials, Parts and assemblies meet communicated requirements.
- b) All exemptions being utilized in each material, part, or Product provided to Master Lock are thoroughly identified and documented on the Material Declarations.
- c) Sign the Declaration of Compliance and that the Declaration is signed by an authorized person from Product assurance or similar organization.
- d) Provide technical documentation in the form of internal design controls, supplier data, material declaration and/or analytical test reports from a Master Lock approved third-party test laboratory.
- e) Establish procedures to assist Master Lock in the identification of identify Products during all stages of receipt, Production and distribution and at a minimum, identification and segregation is required for a) receiving inspection; b) Production work in progress; c) nonconforming Product; d) reject Product; e) Product on-hold; and f) conforming Product.
- f) Has set up and maintains controlled documentation of Product traceability during all stages of receipt, Production and distribution, including, minimum traceability for all Products, components and raw Materials by lot or batch.
- g) Retain all Declarations of Compliance they obtained from their suppliers which were used to confirm its conformity for Master Lock’s Products and Materials, Parts and assemblies (“Third Party Declarations”).

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- h) Provide copies of Third Party Declarations to Master Lock upon request.
- i) Maintain adequate documentation for all Declarations of Conformity, for inspection, upon request, for a period of no less than ten years after sale of the Products to Master Lock.

6) MASTER LOCK APPROVED THIRD-PARTY LABORATORIES

- a) Anesco Group
- b) Bureau Veritas
- c) Intertek
- d) SGS
- e) TUV

7) FORMS

Master Lock Associates can access referenced documents from Agile.

Suppliers can access the above-referenced documents from the MasterLock.biz website located here:

<http://www.masterlock.biz/login.jsp>

Login: masterlock@mlock.com

Password: masterlock

REV	DESCRIPTION	BY	DATE
A	Initial Document	C. Isetts-Williams	March 2, 2016